



THE LAW OFFICES OF P.B. TUFARIELLO, P.C.

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Tuesday, October 8, 2024

VIA ECF

Hon. Steven I. Locke
United States District Magistrate Judge, E.D.N.Y.
100 Federal Plaza, Courtroom 820
Central Islip, New York 11722

Re: EXHIBITION HUB US HOLDING LLC.,
v. VINCENT VAN GOGH CAFE LLC
Case Number: 2:24-cv-0988(GRB)(SIL)
Our File No.: 7360-4

Your Honor:

In the abovementioned matter, we represent Defendant VINCENT VAN GOGH CAFE LLC ("Defendant").

On October 8, 2024, the parties met and conferred. The parties discussed the Court's September 23, 2024, conference, from which the Defendant's undersigned counsel was unintentionally absent, which, as we embarrassingly and regretfully explained to the Court during our call into the court, was due to a scheduling snafu. We apologize(d) to Plaintiff's counsel and take this opportunity to also apologize to the Court. We meant no disrespect to either the Court or our adversary counsel, Mr. Reuber.

Further, per the Court's Order, the parties jointly prepared an amended discovery schedule as follows:

<u>Event</u>	<u>Date/Deadline</u>
Motions to join new parties or amend pleadings (unless based on new information obtained in discovery)	October 31, 2024
Completion of fact depositions	January 10, 2025
Completion of fact discovery	January 10, 2025
Rule 26 disclosures for case-in-chief experts	January 31, 2025

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Hon. Stephen I. Locke
CASE NUMBER: 2:24-cv-0988
10/8/2024
Page 2

Rule 26 disclosures for rebuttal experts	February 28, 2025
Completion of expert discovery	March 31, 2025
Filing of dispositive motions	May 15, 2025
Pretrial conference in courtroom 820	

The parties have left the pretrial conference date in courtroom 820 blank. The court has scheduled such conference for March 11, 2025, at 10:30 a.m., and a proposed Joint Pre-trial Order to be electronically filed on March 8, 2025. Considering the parties' proposed amended discovery schedule ending on May 15, 2025, the parties respectfully and jointly move the Court to continue the Pretrial conference date, to a date and time after the filing of the parties' Dispositive Motions on May 15, 2025.

We appreciate the Court's patience, courtesies, and understanding.

Respectfully Submitted,

s/Cameron Reuber/s

Cameron Reuber

Counsel for Plaintiffs

s/Panagiota Betty Tufariello/s

Panagiota Betty Tufariello

Counsel for Defendant

PBT: dt

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Hon. Stephen I. Locke
CASE NUMBER: 2:24-cv-0988
10/8/2024
Page 3

CERTIFICATE OF SERVICE

I, Panagiota Betty Tufariello, hereby certify that on Tuesday, October 8, 2024, I caused a true and correct copy of the foregoing Letter to the Honorable U.S. Magistrate Judge Locke to be filed and served via the Court's ECF system on all parties registered to receive notice and on the parties listed above in the manner indicated.

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